

THOMAS SARANELLO

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CARMELO MILLAN,	:	NO. 07CIV3769
Individually and on	:	
Behalf of All Other	:	
Persons Similarly	:	
Situated,	:	
Plaintiff	:	
	:	
VS.	:	
	:	
CITIGROUP, INC., and	:	
CITIGROUP TECHNOLOGY,	:	
INC.,	:	
Defendants	:	

DEPOSITION OF THOMAS G. SARANELLO

Taken in the Locks Law Firm, 110  
East 55th Street, 12th Floor, New York, New York, on  
Thursday, February 7, 2008, commencing at 11:30 a.m.  
before Sally A. Slifer, CSR, Registered Merit  
Reporter, Certified Realtime Reporter.

APPEARANCES:

LOCKS LAW FIRM

By: JANET C. WALSH, ESQ.

110 East 55th Street, 12th Floor

New York, NY 10022

-- For the Plaintiff

THOMAS SARANELLO

Page 2

APPEARANCES: (Continued)

MORGAN LEWIS

By: SARAH E. BOUCHARD, ESQ.

SARAH E. PONTOSKI, ESQ.

1701 Market Street

Philadelphia, PA 19103

-- For the Defendant

THOMAS SARANELLO

Page 151

1 engineer?

2 A. (Witness shakes head.)

3 Q. Was he a computer systems analyst?

4 A. I don't know.

5 Q. Was he involved when he worked for you in the  
6 application of system analysis techniques?

7 A. No.

8 Q. Did he ever have to determine system  
9 functional specifications?

10 A. No.

11 Q. He didn't design computer systems or  
12 programs, did he?

13 MS. BOUCHARD: Objection, other than  
14 the designs he already talked about?

15 A. I don't know.

16 MS. WALSH: I am asking him  
17 specifically.

18 Q. You don't know?

19 A. I don't know.

20 MS. BOUCHARD: Do you not know what  
21 she's talking about? He just said, he doesn't know  
22 what that is.

23 A. It sounds like engineering to me. It doesn't  
24 sound like anything he did for me.

25 Q. For you did he ever design the specifications

THOMAS SARANELLO

Page 152

1 for the operations of the systems in CTI?

2 A. No.

3 Q. One of his functions that he performed when  
4 he reported to you is installing network applications,  
5 networks and hardware?

6 A. Not applications, no.

7 Q. Not applications?

8 A. No.

9 Q. Configuring networks and hardware?

10 A. At times, yes.

11 Q. Testing networks and hardware?

12 A. I believe that's more of the lab  
13 functionalities that may be referenced there.

14 Q. Did he ever have anything to do with  
15 applications?

16 A. Vending? Sorry.

17 Q. Did he have anything to do with applications?

18 A. No.

19 Q. Trouble shooting, he was involved in trouble  
20 shooting networks and hardware?

21 A. Yes. But again, I think that pertains to  
22 lab.

23 MS. WALSH: I don't have any other  
24 questions.

25 \* \* \*